

**United States Bankruptcy Court
Northern District of Illinois, Eastern Division**

IN RE: Teresa Davis)	Chapter 13
)	Case No. 17 B 05192
Debtor(s))	Judge Timothy A Barnes

Notice of Motion/Certificate of Service

Teresa Davis
4842 S Drexel Blvd
Suite 300
Chicago, IL 60615

Debtor Attorney: Bennie W Fernandez
via Clerk's ECF noticing procedures

On April 20, 2017 at 9:00 am, I will appear at the location listed to the right, and present this motion, a copy which is hereby served upon you.

> Dirksen Federal Building
> 219 South Dearborn
> Courtroom 744
> Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Tuesday, March 28, 2017.

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

Objection to Discharge

Comes now Marilyn O. Marshall, Standing Trustee, and requests that the Court enter an Order denying the debtor's discharge pursuant to 11 U.S.C. §1328(f) and Rule 4004, and in support thereof respectfully states the following:

1. Debtor filed for Chapter 13 relief on February 23, 2017.
2. Previous to the case at bar the following case was filed:

<u>Case Number</u>	<u>Debtor Name</u>	<u>Filed Date</u>	<u>Discharged Date</u>
1:01-bk-39839	Smart, Teresa (db)	11/13/2001	01/14/2005
1:15-bk-35983	Jones, Teresa (db)	10/22/2015	02/10/2016

3. Debtor received a discharge in the Chapter 7 case that was filed within 4 years of the filing of the present case.
4. Because the debtor received a discharge in a case filed within the preceding time frame, the debtor is not entitled to a discharge in this case.

WHEREFORE, the Trustee prays that this Court enter an Order denying the debtor's discharge, and for any and all other relief this Court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE